

EXHIBIT A

DECLARATION

1. My name is Arlene K. Lim. I am over the age of eighteen years and am competent to make this declaration. I am Vice President, Corporate Legal and Transactions of Health Care Service Corporation, a Mutual Legal Reserve Company, and I have personal knowledge of the statements and facts set forth in this Declaration, all of which are true and correct.

2. At all relevant times, including both now and at the time this lawsuit was filed on June 20, 2023, Blue Cross and Blue Shield of Montana has been a division of Health Care Service Corporation, a Mutual Legal Reserve Company, which is an Illinois corporation, with its principal place of business in Chicago, Illinois.

I declare under penalty of perjury that the foregoing is true and correct.

SIGNED this 6th day of September 2023.

HEALTH CARE SERVICE CORPORATION, A
Mutual Legal Reserve Company, doing
business in Montana as BLUE CROSS AND BLUE
SHIELD OF MONTANA

DocuSigned by:

BE3BC416436B4AE...

By: Arlene K. Lim

Its: Vice President, Corporate Legal and Transactions